

# EXHIBIT F

Subject: MDL 2804 - Kroger National Custodians

Date: 4/24/2023 11:07 AM

From: "Jeff Gaddy" <jgaddy@levinlaw.com>

To: "Ronda Harvey" <rharvey@bowlesrice.com>, "Ashley Hardesty Odell" <ahardestyodell@bowlesrice.com>, "Will Lorensen" <wlorensen@bowlesrice.com>, "Gabriele Wohl" <gwohl@bowlesrice.com>, "Aaron Boone" <aboone@bowlesrice.com>

Cc: "Peter Mougey" <pmougey@levinlaw.com>, "Page Poerschke" <ppoerschke@levinlaw.com>, "Laura Dunning" <ldunning@levinlaw.com>, "Mildred Conroy" <mconroy@simmonsfirm.com>, "Anthony Irpino" <airpino@irpinolaw.com>, "James Young x6172" <JYoung@ForThePeople.com>, "Renee Cook x6161" <rcook@forthepeople.com>, "Douglas Acklin x6133" <dacklin@forthepeople.com>, "Mike Fuller" <Mike@FarrellFuller.com>, "Kathleen Clark" <Kathleen@mchughfuller.com>, "Katie Mayo" <kmayo@levinlaw.com>, "tracks6to10defendants@bbhps.com" <tracks6to10defendants@bbhps.com>, "ct7-11\_opioidbwteam@simmonsfirm.com" <ct7-11\_opioidbwteam@simmonsfirm.com>

Counsel for Kroger,

After reviewing the PCC Minutes and Buzzeo Audits that were improperly withheld from the PEC through late 2022 and then subsequently produced just before the discovery stays were entered, as well as the recent document productions that were ordered by SM Cohen as sanctions for Kroger's improper conduct, it has become apparent that the following additional national custodians are appropriate and should be added.

1. Francie Tucker (all search terms)
2. Martha Sarra (all search terms)
3. Bill Shinton
4. Nick Gonzales
5. Lincoln Lutz
6. Philecia Avery (all search terms)

Please confirm by Thursday April 27 that Kroger has retained material for the above-listed individuals and that Kroger will produce their custodial files. Also, please provide some dates in July or August for these individuals to be deposed once their files have been produced. If any of these individuals are former employees that you do not represent, please advise us of that as well.

Thank you,  
Jeff

**Jeff Gaddy**

*Attorney*

Levin, Papantonio, Rafferty, Proctor,  
Buchanan, O'Brien, Barr, & Mougey P.A.  
316 S. Baylen Street, Suite 600  
Pensacola, FL 32502-5996  
850.435.7054 (office)  
850.436.6054 (fax)  
[jgaddy@levinlaw.com](mailto:jgaddy@levinlaw.com)



THE INFORMATION CONTAINED IN THIS TRANSMISSION IS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, DO NOT READ IT. PLEASE IMMEDIATELY REPLY TO THE SENDER THAT YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR. THEN DELETE IT. THANK YOU.